

IN THE UNITED STATES FEDERAL DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

vs.

JOYCE RENEE KING
Defendants.

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CR. NO. 2:05-cr-00297- WHA

MOTION TO CONTINUE PRE-TRIAL

COMES, James R. Cooper, Jr. who requests that the Pre-Trial conference set for May 15, 2006, be continued and states in support thereof as follows:

1. Mr. and Mrs. Cooper's youngest daughter, Parker, graduates from Reed College in Portland, Oregon that day. Mr. Cooper has made arrangements to be present for her graduation, leaving Montgomery May 12 and returning May 17, 2006.
2. Mr. Cooper has made airline reservations to fly out of Montgomery May 12 and return May 17, 2006. Those tickets are pre-paid and not refundable. Mr. Cooper has also made room reservations. His other daughter who is living in Washington, D. C. is flying out for the graduation. This is an event, he dearly wishes to see, as does his wife.
3. The ends of justice would not be compromised, if the pre-trial were scheduled on a different day.

RESPECTFULLY SUBMITTED,

s/James R. Cooper, Jr. (COO021)
COOPER & COOPER
Attorney for Defendant
312 Scott Street
Montgomery, AL 36104
(334) 262-4887

CERTIFICATE OF SERVICE

I hereby certify that on this the 18th day of April, 2006, I have served a copy of the foregoing **Notice of Appearance** upon Ms. Susan Redmond, Asst. U.S. Attorney, P.O. Box 197, Montgomery, Alabama 36101 and all other parties by electronic case filing, by placing a copy of same in the United States Mail properly addressed and postage prepaid.

cc:

Renee King
14 Johnson Ave
Montgomery, Al 36109